

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:

Bankruptcy No.: 16-22589-CMB  
Chapter 13

Douglas R. Nash, Debtor

Related to Document No. 53  
Related to Claim No. 8

JPMorgan Chase Bank, N.A., Movant

v.

Douglas R. Nash and  
Ronda J. Winnecour, Esq., *Trustee*,  
Respondents

**DEBTOR'S DECLARATION REGARDING MORTGAGE PAYMENT CHANGE**

AND NOW, comes the Debtor/Respondent Michael S. Lazaroff, by and through his counsel Michael S. Lazaroff, Esquire, and respectfully represent as follows:

1. Movant filed a *Notice of Mortgage Payment Change* at Claim 8 in the above captioned Chapter 13 case.
2. By Order of Court dated July 25, 2017, this Court directed the debtor or debtor's counsel, within twenty-one (21) days from the date that the Notice was docketed, to file either an Amended Chapter 13 Plan; a Declaration that the existing Chapter 13 Plan is sufficient to fund the Plan with the modified debt; or, an Objection to the Notice of Mortgage Payment Change.
3. Debtor and undersigned counsel hereby declare that the existing Chapter 13 Plan is sufficient to fund the plan with the modified debt.

Respectfully submitted,

/s/ Michael S. Lazaroff

Michael S. Lazaroff, Esquire  
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